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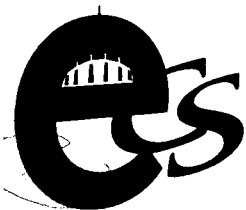
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ABSTRACT

This paper aims to present a methodology for assessing within-state regional needs for community college services, and describe the policy tools and strategies available to policymakers who intend to address these needs. The paper builds on work that the National Center for Higher Education Management Systems (NCHEMS) prepared for the National Center for Public Policy and Higher Education (NCPPE). Offers advice for: (1) Identifying the educational needs of key client groups; (2) Comparing client groups' educational needs to available community college services; (3) Identifying gaps in services; and (4) Summarizing findings and identifying priorities. Also includes guidelines for conducting a policy audit and designing policy alternatives. Five appendices include: (1) Trends in Per-Capita Income for Individuals of Different Educational Levels; (2) Examples of State Comparative Data on Social and Economic Indicators Correlated with Educational Attainment; and (3) An Example of Use of Data to Identify Intrastate Regional Disparities (Kentucky). Argues that narrowing gaps in educational attainment and performance between regions is crucial if state leaders are to improve the quality of life and economy for all the state's population. (NB)



**Education Commission
of the States**

Narrowing the Gaps in Educational Attainment Within States

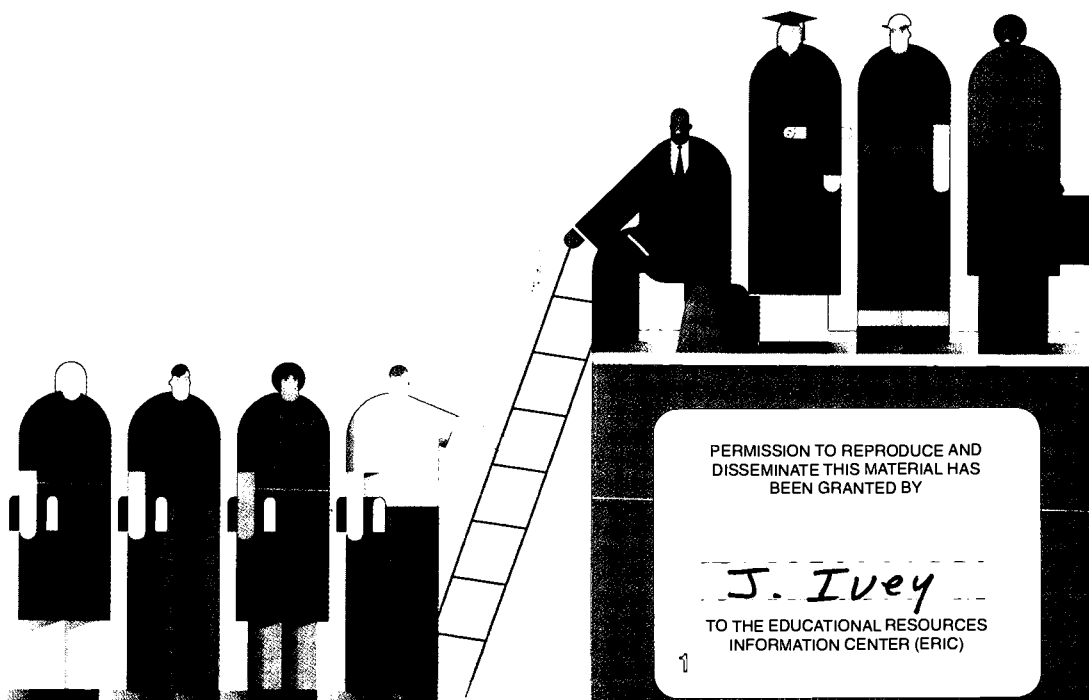
A Policymaker's Guide to Assessing and Responding
to Needs for Community College Services

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What's Inside:

- Assessing Regional Needs
- Conducting a Policy Audit
- Designing Policy Alternatives



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A Policymaker's Guide to Assessing and Responding
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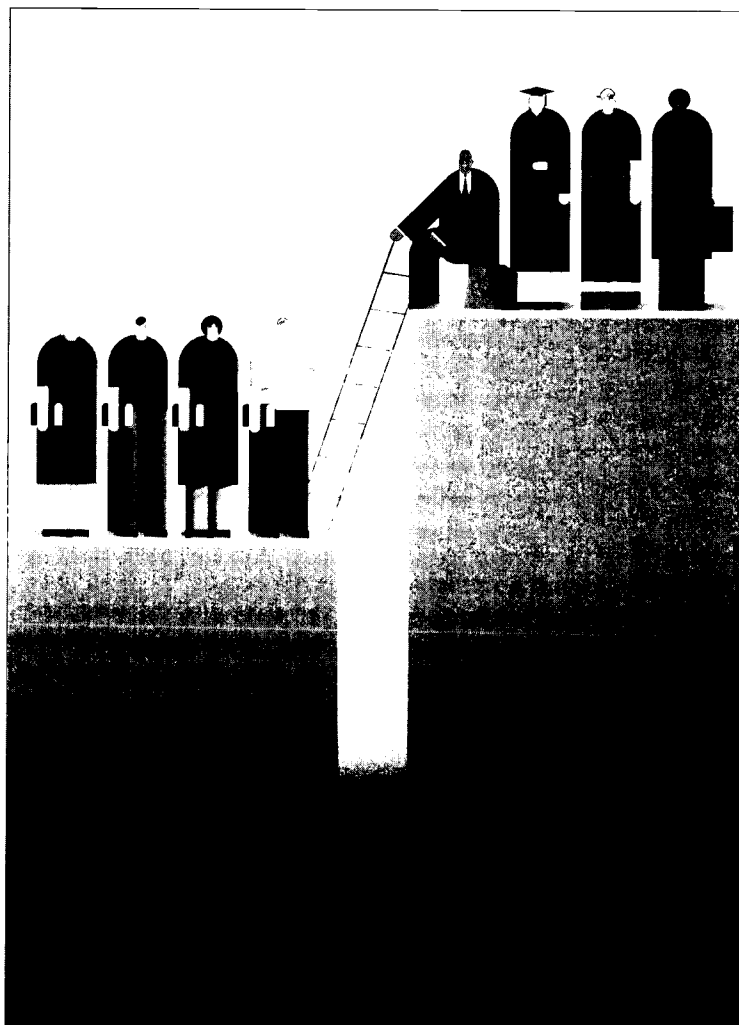
By Aims C. McGuinness Jr.
and Dennis P. Jones



Education Commission
of the States

Center for Community College Policy

October 2003



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Most state policymakers and education leaders are keenly aware that educational attainment and state performance are inextricably linked to the future economy and quality of life in their states. But few are knowledgeable about how to identify and respond to the educational needs of their populations and achieve measurable improvement. To com-

plicate matters further, all states have to varying degrees significant regional disparities *within* the state in educational attainment and performance that statewide averages can mask.

Narrowing the Gaps in Educational Attainment Within States: A Policymaker's Guide to Assessing and Responding to Needs for Community College Services is designed to address these issues. Authors Aims C. McGuinness Jr. and Dennis P. Jones draw upon their extensive experience in helping state leaders use economic and demographic data to define and analyze with greater precision the educational needs of their state's population, create a policy environment for change and formulate an integrated set of policy initiatives. Here they extend their analyses to an examination of educational needs for community college services in particular.

In the guide, McGuinness and Jones take a straightforward approach in presenting a step-by-step methodology for assessing "key client groups" needs for community college services and then describing the policy

tools and strategies available to policymakers who want to address these needs. Throughout the report, they offer numerous examples that help illustrate ways in which these principles have been applied in a variety of circumstances and settings. The authors carefully note, however, that "there is no single answer" but rather "multiple paths" for achieving goals for improv-

ing educational attainment and statewide performance within each state's regions. This guide offers insights based on experience that can help point the way.

The Education Commission of the States (ECS) commissioned this report as part of its Closing the College Participation Gap initiative, supported by the W.K. Kellogg Foundation. The initiative's aim is to assist state policymakers and other state leaders in their efforts to expand college access and increase participation, particularly among underserved and disadvantaged populations. A related objective is to examine the role of community colleges in helping to inform and respond to states' postsecondary education and training needs. ECS is grateful to Aims and Dennis for their contribution in furthering our knowledge about assessing regional needs for community college services and in shaping the policy alternatives that can help respond to those needs.

Additional acknowledgements also are in order. Many thanks go to members of the Kellogg Planning Group and other reviewers who provided comments on an earlier draft of this report. They include Cynthia Barnes, Katherine Boswell, Gordon Davies, Genevieve Hale, Mario Martinez, Dewayne Matthews, Kay McClenney, James Mingle, Michelle Nilson, Robert Palaich and Esther Rodriguez. At ECS, Suzanne Weiss, Sherry Free-land Walker and Josie Canales edited the paper and helped to coordinate its publication. Kindle Merrell provided internal layout and desktopping. Designer and illustrator Lex Papesch created the cover and oversaw production. Finally, the W.K. Kellogg Foundation, particularly Gail D. McClure, helped make this paper possible through its generous support of this initiative.

ECS welcomes your thoughts and reactions to this paper.

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October 2003

Some level of postsecondary education is becoming a necessity for entry into the American middle class. The loss of purchasing power over the past decade on the part of those without some education beyond high school bears witness to the extent to which the economy punishes those who do not pursue it. **Appendix A** displays the trends in per-capita income for individuals with various education levels.

The benefits of postsecondary education are by no means confined to those that accrue to the individual. Policymakers increasingly recognize that improving educational attainment is a key ingredient in their efforts to achieve broader social and economic goals. Indeed, high levels of educational attainment and performance are keys to achieving improvements in virtually every aspect of a state's quality of life and economic competitiveness. Conversely, low levels of education among the adult population in a state have been shown to negatively affect:

- Per-capita income and the strength of the state's economy as measured by gross state product, tax revenues per capita and other indices
- Health of the state's population
- The well-being of children
- The rate of violent crime
- Voting rates
- Preparation level of the workforce.

Appendix B describes where to obtain more information about each of these social and economic indicators, which vary significantly from state to state. Because information about educational attainment and social and economic conditions are now so readily available, poor state or local performance on any of them becomes a matter of concern for political and civic leaders. How, for example, do they sell their states or communities to potential new employers when the data reveal that the necessary pool of highly prepared workers is not available?

Just as important, there are varying degrees of disparity in educational attainment and performance *within* states – variations that often are masked by statewide

averages. A state may perform well overall compared to other states based largely on the strength of the wealthiest elements of its population, but serious deficits in educational attainment may exist in inner cities and rural areas and among low-income populations. The wide range of regional* disparity that can occur within a state is illustrated in **Appendix C** using the state of Kentucky as an example.

The purpose of this paper is to: (1) present a methodology for assessing within-state regional needs for community college services and (2) describe the policy tools and strategies available to policymakers who intend to address these needs. The paper builds on work that the National Center for Higher Education Management Systems (NCHEMS) prepared for the National Center for Public Policy and Higher Education (NCPPHE). *Some Next Steps for States: A Follow-Up to Measuring Up 2000* contains advice on defining and analyzing state and regional postsecondary education needs, formulating a public agenda and creating a policy environment for change. This paper extends the scope to focus more intensively on state and regional needs for community college services in particular.

State policymakers often look to community colleges as a way to narrow disparities in educational attainment among populations and regions of the state because of their mission and geographic location. One function of community colleges is to provide low-cost, open-access education and other services to residents and employers in specific regions of the state. Not all states, however, have statewide community college systems. And even in those that do, the institutions may not necessarily be linked to a state or regional strategy aimed at narrowing disparities. Therefore, it is important to focus first on using data to define the *needs of key client groups* within the state rather than on a specific institutional form. Then it is necessary to identify what services commonly provided by community colleges are already available to address these client needs.

The results of such an analysis contribute to the identification of the social and economic conditions most

Focus first on using data to define the needs of key client groups. Then identify what services commonly provided by community colleges are already available to address these needs.

*For purposes of this paper, a region is defined as a county, group of counties or other geographically discrete area within a state.

in need of attention – that is, they help to define a “public agenda.” These same results also can have great communication value, serving as a device for building consensus around a public agenda. They help explain to policymakers and the general public why attention to key educational issues is of paramount importance to the future economy and quality of life of the state and its citizens. Additionally, use of this information over time provides a mechanism for

monitoring progress toward stated goals, and thus serves as a vehicle for accountability.

In short, information about the needs of various client groups is essential to building public understanding of the challenges facing a state, and it plays an important symbolic role in creating public expectations and ensuring accountability to that same public.

Assessing Regional Needs for Community College Services

Four steps are involved in assessing regional needs for community college services: (1) identify the educational needs of key client groups, (2) compare client groups’ needs to available community college services, (3) identify gaps in services and (4) summarize findings and identify priorities.

1. Identify the Educational Needs of Key Client Groups

Most needs assessments for educational services start from an institutional perspective: “Here are the services and programs we are equipped to provide; where do we look for markets for these offerings?” Any strategy to raise educational attainment and improve state or regional performance on its related social or economic measures must begin with identifying the education and training needs of the various client groups that community colleges typically serve.

Community colleges usually serve four different client groups:

- **In-school youth.** These are high school students who are concurrently enrolled in a community college, as well as elementary and middle school students who participate in early intervention programs and other services that promote strong preparation for college-level work.

Assessing Regional Needs

- Identify educational needs of key client groups
- Compare needs to available community college services
- Identify gaps in service
- Summarize findings and identify priorities

- **Recent high school graduates.** Typically, these are students who graduated from high school within the previous 6-12 months.

- **Adults.** This group includes:

Young adults

- Who left high school before obtaining a diploma and who are seeking adult basic education or preparation for a General Educational Development (GED) credential exam or
- Who obtained a high school diploma or equivalent, entered the workforce directly from high school and are returning to education after a hiatus of one or more years.

Older adults with work experience and a wide range of prior learning

- Who possess less-than-high school education and are seeking adult basic education or preparation for the GED or
- Who have one or more years of postsecondary education and are seeking further education or training.

- **Employers.** This client group is distinguished from the general adult population because the principal source of demand is the employer, not the adult – although adults are the clients actually served. Another distinguishing factor is that the location for service is often (but not necessarily) at the work site, not at an educational facility.

2. Compare Client Groups’ Educational Needs to Available Community College Services

Information about the educational needs of each of the different key client groups can then be compared to the types of services that community colleges in the state (and in regions within the state) provide. The services that community colleges typically provide in states with fully developed and effective institutions and systems include:

Table 1. Conceptual Relationships Between Key Client Groups and Community College Services

Services	Primary Client Groups			
	In-school youth (secondary education)	Recent high school graduates	Adults	Employers
Remedial and developmental education and adult education	●	●	●	●
General education	●	●	●	●
Transfer preparation	●	●	●	
Career preparation	●	●	●	●
Customized training, rapid-response workforce development			●	●
Community service (noncredit courses and other services to the community)	●	●	●	●
Brokering and serving as a delivery site for other providers	●	●	●	●

- Remedial and developmental education and adult basic education
- General education
- Transfer preparation
- Career preparation
- Customized training and rapid-response workforce development
- Community service (noncredit courses and other services to the community)
- Brokering the services of other providers and/or functioning as a delivery site for those services; for example, four-year institutions offering upper-division baccalaureate programs on a community college campus.

Table 1 presents a conceptual framework or matrix illustrating the various ways in which community colleges serve each of the client groups. It can be used as a template for assessing the needs of client groups within regions of the state. The purpose for this region-by-region analysis is to obtain a picture of the variations across the state and the unmet need for the types of services identified in **Table 1**.

The matrix should be applied to all areas of the state, not just those currently served by community colleges or other postsecondary institutions. Too often, analyses of this kind begin with the existing institutions and focus only on the service areas of those institutions. As noted earlier, the beginning point for any educational needs assessment must be the state's population, not the institutions.

Appendices D, E, F and G contain tables that describe in greater depth how community college services differ for each of the key client groups. These tables also include examples of the data that can serve as indices or measures in assessing educational needs for particular community college services. Here are a few examples of the types of regional data that can be used to assess the need for remedial, developmental and adult education services for each of the four groups:

- **In-school youth.** The percentage of 8th-grade students within a region who are performing below state standards on mathematics, reading, science or writing assessments is an indicator of potential needs for services that community colleges can provide to support secondary school improvement. Additionally, high dropout rates among secondary school students can indicate the presence of a sub-population that might benefit from involvement in an alternative learning environment.
- **Recent high school graduates.** The first measure of need for services is data about participation rates in any form of postsecondary education. In addition, assessment data about entering college freshmen from a given region can be an indicator of the quality of preparation in that region's secondary schools. As states implement "gateway" assessments that students must pass before graduating from high school, regional student performance data can serve as an indicator of the need for services at the community college level. At a minimum, they can serve as a temporary measure pending improvements in secondary school performance. College placement exams are another source of information in this regard.
- **Adults.** High school dropout rates can be an indicator of the need for remedial and developmental

services. Data about the region's population of 18- to 24-year-olds and those age 25 and older with less than a high school credential provide additional insights. Other data regarding the need for these services include county-level census data on educational attainment and surveys of adult literacy (including synthetic estimates if the state did not participate in the 2002 National Assessment of Adult Literacy, which is a source of county-level data).

- **Employers.** An assessment tool such as ACT WorkKeys can provide valuable information about the needs of the business community for development of literacy and workplace skills. Employers also report on numbers of job applicants who fail screening tests.

3. Identify Gaps in Services

This step involves assessing the extent to which institutions are providing – or have the capacity to provide – needed services. In many states, community colleges are not the only providers of such services. Multiple forms of delivery have evolved in many states for one or more of the services commonly associated with the community college mission. Within a particular region, other providers may include public and private universities (both main and branch campuses), workforce development centers, community learning centers, for-profit trade schools, state technical schools or colleges, and distance-learning providers. It is important to take these other delivery forms into consideration when addressing the question of whether there is a need for additional community college services or for changes in state policy.

It is important, too, to consider not only the particular service, but also whether *the manner in which the service is provided* is consistent with the community college mission in terms of accessibility, price, cost and flexibility to meet client needs. For example, the characteristics that distinguish community colleges from most other providers are:

- **Open access and a focus on student goal attainment.** Community college services emphasize open access and a focus on assisting students in meeting their learning (and often their employment) goals. The emphasis is on assessment of entering students – not to determine who is to be admitted (except for certain programs such as nursing), but to ensure proper placement and, if necessary, remedial and developmental services and support.
- **Low price.** Price pertains to what students and their families pay through tuition and required fees. Low tuition is a fundamental dimension of community college services. Required tuition and fees at

community colleges are generally one-third to one-half of those at public universities in the same state.

- **Low cost.** Costs pertain to institutional outlays per student as measured by education and general expenditures and transfers per full-time equivalent student. The cost per student for community college services tends to be two-thirds or less of the costs incurred at state universities and only one-third of those at major public research universities.
- **Flexibility and responsiveness to client needs.** Community college services stress providing programs and courses at times and places – and through modes of delivery, pedagogy and student support services such as assessment, advising and child care – that meet the needs of students and other clients. For example, the busiest time on most community college campuses is after 5 p.m., when employed adults have an opportunity to continue their education.

Potential providers of the different types of community college services are listed in **Table 2**. In states with well-developed community college systems, community colleges themselves will be the primary providers of the services contained in the table. In other states, community colleges may be only one of several providers. For example, adult education services may be provided through adult learning centers linked to the public schools, and not through the community colleges. In still other states, several institutions may provide the services.

As emphasized above, the services also should be provided in a manner that is consistent with the community college mission in terms of accessibility, price, cost and flexibility to meet client needs. For example, an institution may offer certificate or associate degree programs but do so in a manner that is inaccessible to certain client groups, unaffordable or inconvenient for adult learners.

4. Summarize Findings and Identify Priorities

Drawing on the assessments of need and capacity, the next step is to summarize findings and set priorities. The following examples illustrate the kinds of findings that emerged from regional analyses of client group needs and community college services in the states of Kentucky, Oklahoma, Pennsylvania and West Virginia.

A study of adult literacy in **Kentucky** found that 40% of the state's population age 16 to 64 functioned at the two lowest levels of literacy, but even more serious were the disparities within the state. In terms of educational attainment, in 31 of the state's 120 counties more than

Table 2. Potential Providers of Community College Services

Community College Services	Clients			
	In-School Youth (Secondary Education)	Recent High School Graduates	Adults	Employers
Remedial and Developmental Education	• Secondary schools • Community colleges • Private providers	• Community colleges • Universities • Adult education providers • Private providers	• Community colleges • Universities • Adult education providers • Private providers	• Community colleges • Adult education providers • Employer-sponsored programs
General Education	• Secondary schools • Community colleges	• Community colleges • Universities	• Community colleges • Universities	• Community colleges
Transfer Preparation	• Community colleges	• Community colleges • Universities	• Community colleges • Universities	
Career Preparation	• Community colleges • Technical schools and colleges	• Community colleges • Technical schools and colleges • Proprietary trade schools • Employment and training providers	• Community colleges • Technical schools and colleges • Proprietary trade schools • Employment and training providers	• Community colleges • Technical schools and colleges • Proprietary trade schools • Employment and training providers
Customized Training, Rapid-Response Workforce Development		• Community colleges • Technical schools and colleges • Proprietary trade schools • Employment and training providers	• Community colleges • Technical schools and colleges • Proprietary trade schools • Employment and training providers	• Community colleges • Technical schools and colleges • Proprietary trade schools • Employment and training providers
Community Service (Noncredit and Other Services to the Community)		• Community colleges	• Community colleges	
Brokering and Serving as a Delivery Site for Other Providers		• Community-based learning centers • Community colleges	• Community-based learning centers • Community colleges	• Employment and training centers • Community colleges

52% of the adult population lacked a high school education. An analysis of the provision of adult education services revealed that the state was serving approximately 5% of the target population. A region-by-region analysis showed a highly splintered network of providers (mainly linked to public secondary schools) and a misalignment of the location of providers with the regions of greatest need. The community colleges governed by the state university played an extremely limited role in serving this population.²

An analysis of the potential needs for postsecondary education services in various regions of **Oklahoma** found that 93% of the state's population lives within 30 miles of existing public campuses or sites. Nevertheless, the programs and services available at each site did not necessarily meet the needs of the region's population. For example, some of the institutions and sites were oriented primarily to the needs of recent high school graduates seeking a baccalaureate degree and not to the needs of the region's adult population.³

A study of the availability of community college services in **Pennsylvania** found a strong relationship between high participation rates and counties' sponsorship of community colleges. Twenty-seven of the state's 67 counties had essentially no community college services, a finding that had significant implications for Pennsylvania's efforts to improve educational attainment and workforce preparation. Counties where public institutions were located had higher college-going rates (first-time full-time freshmen per recent high school graduates) than those without a public institution. Among the counties with high college-going rates, those with community colleges had the highest rates. Alternatively, none of the counties with low college-going rates were sponsors of community colleges. The differences among counties were most striking for part-time lower-division participation rates. Only counties that were sponsors of community colleges had participation rates of part-time lower-division students age 25 to 44 that

were at or above the statewide average. Because the state's public universities are generally not significant providers of part-time opportunities for adults, the location of a state university in a county was found to have only a limited impact on part-time lower-division participation.⁴

A study for the **West Virginia** Legislature found that despite the state's rank of 47th in the nation in the percentage of the adult population age 25 and older with a high school diploma or equivalent, the state was serving only a fraction of the population that had not completed their secondary education. Adult education services reached less than 5% of the target population. At the same time, the state's higher education system was oriented primarily toward recent high school graduates. The state ranked 48th in the nation in part-time students as a percentage of the population age 25-44. Even more significant was the finding of wide disparities among counties. The report underscored that all but two of the state's 10 community colleges were appended to four-year institutions and that the culture of these "component" community colleges was strongly influenced by the priorities and culture of the sponsoring four-year institutions. Furthermore, the tuition rates for component community colleges were the same as those for the four-year institutions – meaning that community college students were not given the same lower-priced access as at the two freestanding community colleges. Progress in expanding services through community colleges to the state's undereducated adult population had been limited despite repeated legislative directives.⁵

Each of the examples provides evidence of significant disparities among the states' regions in unmet educational needs and in the existing capacity of providers to meet these needs. Each led to concrete policy recommendations to address the identified problems. The next question, then, is: What steps are necessary to identify policy actions that are appropriate to narrow the gap between the state's educational needs and the capacity and services of its educational providers?

Shaping Policy Alternatives

Two steps are important in the process of developing policy alternatives to address the regional educational needs for various client groups and the gaps in community college services that may exist: (1) conduct an "audit" of existing policies to determine how they assist or detract from efforts to address the underlying problems,⁶ and (2) design policies that are aligned with the needs and unique culture and conditions in the state and each of its regions.

1. Conduct a Policy Audit

External (state and system) policies have a decisive effect on whether the full range of community college services are actually provided, especially in a manner consistent

Shaping Policy Alternatives

- Conduct a policy audit
- Design policy alternatives

with the community college mission. Before adding new policies, programs or procedures to those already in place, an audit of the current array of policies is needed. Such an audit typically has two major components:

- A systematic review of existing policies – at least those that are most obviously connected to the areas of performance that have been questioned.
- Interviews with knowledgeable individuals who can share their understanding of what is and what is not working and why.

The objective of conducting a policy audit is to clear the underbrush – that is, remove barriers that would continue to be impediments even if well-designed new policies were implemented. While there are many policies that might warrant specific attention, they almost inevitably fall into a limited number of categories:

- Use of information
- Policy leadership, organization and governance structure
- Finance
- Regulations
- Public accountability

Following are examples of questions that should be asked about policy barriers and supports in each of these areas:

Use of information

- Does the state use information to assess the regional needs of different client groups for educational services?
- Does the state have a student-unit record-tracking system by which information can be gathered and analyzed about how students are served by individual institutions and move through the higher education system as a whole?
- Did the state participate in the 2002 National Assessment of Adult Literacy so that there are state-level and county-by-county data on adult literacy?
- Does the state have the analytic capacity to use existing data for policy purposes?
- Does the state consistently use information to monitor progress on improving educational attainment, as well as on performance relative to important

social and economic indicators? Is this information reported to state policymakers and the public?

Policy leadership, organization and governance structure

- Does the state have a public agenda focused on the needs of the state's population and the regions of the state? Is there an entity that can assume responsibility for making the kinds of assessments of need and capacity called for in this paper?
- Is the state's higher education system organized in a way that supports (or does not create barriers to) regional collaboration among different sectors? For example, are there instances in which two or more service providers (e.g., university branch campuses, community colleges, technical schools or institutes) offer one- and two-year academic and career programs in the same geographic area with limited incentives for regional coordination?
- Are the state's adult basic education and literacy programs offered primarily through secondary schools and adult vocational education centers or does the state, as a matter of policy, recognize and fund community colleges as providers of adult education services?
- Is the community college mission reasonably separated from the four-year university mission or is it subordinated to four-year university policies regarding faculty promotion and tenure and teaching loads (e.g., emphasis on research in promotion and tenure, and teaching loads of 9-12 hours as opposed to 15 hours common for community colleges)?
- Does the overall state structure recognize and support the mission of community colleges or is it dominated by the universities' missions and priorities to the exclusion of the community college mission?
- Does state implementation of the federal Workforce Investment Act draw upon the resources of community colleges or does it rely primarily on free-standing workforce centers and private providers?

Finance

Remedial and developmental education

- Do state policies limit reimbursement only to those students who are in college credit courses?
- Do state student aid policies provide reimbursement to students taking remedial or developmental courses?

- Do student aid policies provide incentives for students to complete remedial and development work and progress to college-level work?

General education

- Do state policies allow simultaneous reimbursement of secondary schools and community colleges for students in dual enrollment/joint enrollment programs or courses (or is there a prohibition against "double-dipping")?
- Do states provide financing for services to certify prior learning of adults?
- Do student aid policies provide benefits for less-than-full-time students?

Transfer preparation

- Are there financial incentives to institutions to transfer students as expeditiously as possible (or, from a negative perspective, incentives for institutions to retain students to generate credit-hour-based funding)?
- Do enrollment or credit-hour-driven funding formulas pit institutions against one another in competition for students (and thereby provide disincentives for collaboration designed to increase transfer rates)?

Career preparation

- Do funding formulas recognize the higher cost of certain career preparation programs (e.g., nursing)?
- Do student aid policies provide benefits for adults attending on a less-than-full-time basis?
- Do state policies provide disincentives for colleges to serve adults in the workplace by providing state financing for only those educational programs and services offered in traditional on-campus, classroom settings?

Brokering and serving as a delivery site

- Is there a provision for funding (e.g., sharing of tuition revenue) for both the "sending" provider institutions as well as "receive-site" institutions for student support and other services in instances where distant institutions provide educational content through a "gateway" provided by a local institution?

Overall financing policies

- Do community colleges have lower tuition rates than the state's four-year institutions?
- Are policies regarding the share of financing

responsibility to be borne by the state, local sponsors and students up to date (and honored)? Do these policies make provision for significant disparities among regions in need and capacity to finance community colleges? For example, do they reflect the very different capacities of local sponsors to provide resources based on property tax levies?

- Are there state financing policies to ensure students who live outside a community college district or service area can have access to community college services at "community college" prices?
- Are financing policies for community colleges aligned with the community college mission or are they designed on the basis of four-year/university academic policies and teaching loads (e.g., 9-12-hour faculty teaching loads compared to 15 hours in community colleges) and on traditional, full-time college student attendees?
- Do capital financing policies that identify space and laboratory needs take into account evening, weekend, summer and other enrollment period scheduling or are they based only on daytime and traditional semester (fall and spring) periods?

Regulations

- Do definitions of service areas restrict the ability of institutions to serve as "receive sites" for courses and programs offered by out-of-area institutions?
- Are there different accreditation standards (e.g., between the Council on Occupational Education and regional accrediting bodies) that create barriers to student transfer?
- Are program approval processes designed to allow for "fast-track" approval of programs to meet the needs of the workforce and employers?
- Are there "silos" that segregate remedial, academic and workforce missions at community colleges, thus creating barriers for disadvantaged populations interested in "college-to-work," short-term programs?
- Do the state's welfare reform programs recognize education as a necessary component in reducing dependence on government assistance?

Public accountability

- Do accountability measures reflect nontraditional modes of delivery necessary to serve certain client groups (e.g., in-school youth, adults in the workplace or students served by multiple providers through learning centers)?

- Do accountability measures emphasize transfer and degree completion in addition to enrollment and credit-hour production?
- Do the accountability systems in place focus on services to client groups and the effect of these services on a region (e.g., measures that hold one or more institutions accountable for a measurable improvement in the educational attainment or performance in a region)?
- Do the accountability measures reflect the identified state priorities? Do they focus on the right issues? Are they specific to counties and regions within the state?

2. Design Policy Alternatives

The priorities for narrowing the gaps between needs and services in each of the state's regions and the evidence from the policy audit provide the basic information for shaping policy alternatives. The following examples illustrate how policymakers in Kentucky and West Virginia used the results of such an analysis to shape policy alternatives to raise educational attainment, improve higher education performance and narrow regional disparities. Each state also made coordinated use of the policy tools described above.

In **Kentucky**, House Bill 1, enacted in 1997, created the Kentucky Community and Technical College System (KCTCS), drawing together under a single entity two units that had previously been subordinated to other

entities: the community colleges that had been governed by the University of Kentucky, and the technical colleges that had been part of the Cabinet for Workforce Development. As a key element of the Commonwealth's Strategic Agenda for Postsecondary Education, KCTCS has spearheaded the state's efforts to uplift the educational attainment, quality of life and economies of each of the state's regions. Senate Bill 1, the Adult Education and Literacy Act of 2000, assigned overall leadership for this area to the Council on Postsecondary Education (CPE). The CPE used data on educational attainment and per-capita income to identify target counties, and implemented financing policies that rewarded providers based on measurable improvements in performance in the counties for which they were responsible.⁷

In **West Virginia**, the Legislature in 2000 enacted Senate Bill 653, which called for a Compact for the Future of West Virginia linking higher education to the future of the state and enacting specific provisions to ensure the availability of community college services in each region of the state. These provisions included "essential conditions" that each community college had to meet to ensure policies were in place to support the community college mission (e.g., independent accreditation as a community college), and a state leadership structure to ensure consistent attention to the state's community and technical college and workforce development needs. Changes also were made in financing policy to support the move to independently accredited community colleges and to align tuition policies with that mission.⁸

Key Principles

As state policy leaders shape alternatives to address priorities, several principles related to policy design and implementation are especially important to keep in mind:

Strive for alignment among policies. Unfortunately, policy tools such as those discussed in this paper are rarely wielded in a coordinated fashion. A common problem is that states often implement policies in isolation from, and sometimes in direct conflict with, one another. One example is a policy to decentralize responsibility for governing institutions that would conflict with another policy providing for centralized regulatory control of operating budgets and academic policy. Another example is the frequent disconnect that occurs between and among state appropriations, tuition and student-aid policy decisions.

Align policies with institutional missions. Policy can have either positive or negative effects on mission

and on the capacity of an institution to provide services to different client groups. For example, it is unrealistic to expect community colleges to serve students in secondary schools if both the schools and the colleges are penalized for doing so in the state's financing policies. Similarly, it is unrealistic to expect two or more institutions in a region to collaborate in providing community college services if the state funding policy pits the institutions against each other in competition for students.

Use differentiated policy to reflect regional differences. States should avoid "one-size-fits-all" policies that apply uniform solutions to highly diverse regional needs and capacity. The key is to develop a statewide policy framework (e.g., definition of "what" is to be achieved or a common set of performance goals and indicators) that can be achieved in different ways ("how") in relation to the unique needs and capacities of each of the state's regions.

Recognize there is no single answer. The reality is that there are multiple paths for achieving the goal of

improving educational attainment and statewide performance within each of the state's regions. In some regions, community colleges may be the most effective policy alternative. In other regions, it may be appropriate to draw on several institutions through a learning center, consortia or other means to ensure

community college services are available. In some cases, the policy tool of financing may be most appropriate, whereas in other cases changes in governance may be necessary. The important point is that solutions should be designed to fit the needs, political and cultural contexts, and capacities of a region.

Conclusion

Narrowing gaps in educational attainment and performance between regions is crucial if state leaders are to improve the quality of life and economy for all the state's population. Community college services are an important means to achieve that goal.

How these services are provided depends on the unique needs of each region and the capacities and

services of the educational providers in those regions. Before acting, state leaders should undertake a region-by-region analysis of various client group needs for various services, an assessment of the capacity and mission of existing providers to offer these services, and an audit of the policy barriers that must be overcome before improvements can be made.

Endnotes

¹ Dennis P. Jones and Karen Paulson (2001). *Some Next Steps for States: A Follow-Up to Measuring Up 2000*. San Jose, CA: National Center for Public Policy and Higher Education.

² Commonwealth of Kentucky, Legislative Research Commission (2000). *Adult Education and Literacy in*

Kentucky. Report for the Task Force on Adult Education and Literacy. Frankfort: LRC. Research Report No. 296.

³ Oklahoma State Regents for Higher Education (1997). *Analysis of Potential Needs for Postsecondary Education Services in Different Regions of Oklahoma*. Report by the National Center for Higher Education Management Systems.

⁴ Pennsylvania Commission for Community Colleges (2001). *Community Colleges and the Future of Pennsylvania: An Agenda for Public Policy*. Report by the National Center for Higher Education Management Systems.

⁵ State of West Virginia (2000). *Report of Study Committee on Higher Education*. Charleston, WV.

⁶ For further description of use of policy audits and formulating policy alternatives, see Dennis P. Jones and Karen Paulson (2001), *Some Next Steps for States: A Follow-Up to Measuring Up 2000*. San Jose, CA: National Center for Public Policy and Higher Education.

⁷ See the Web sites of the Council on Postsecondary Education <http://www.cpe.state.ky.us/keyind/www/index/index.asp> and the Kentucky Community and Technical College System <http://www.kctcs.net> for further information in implementation.

⁸ See the Web site of the West Virginia Higher Education Policy Commission <http://www.hepc.wvnet.edu/> for information on implementation.

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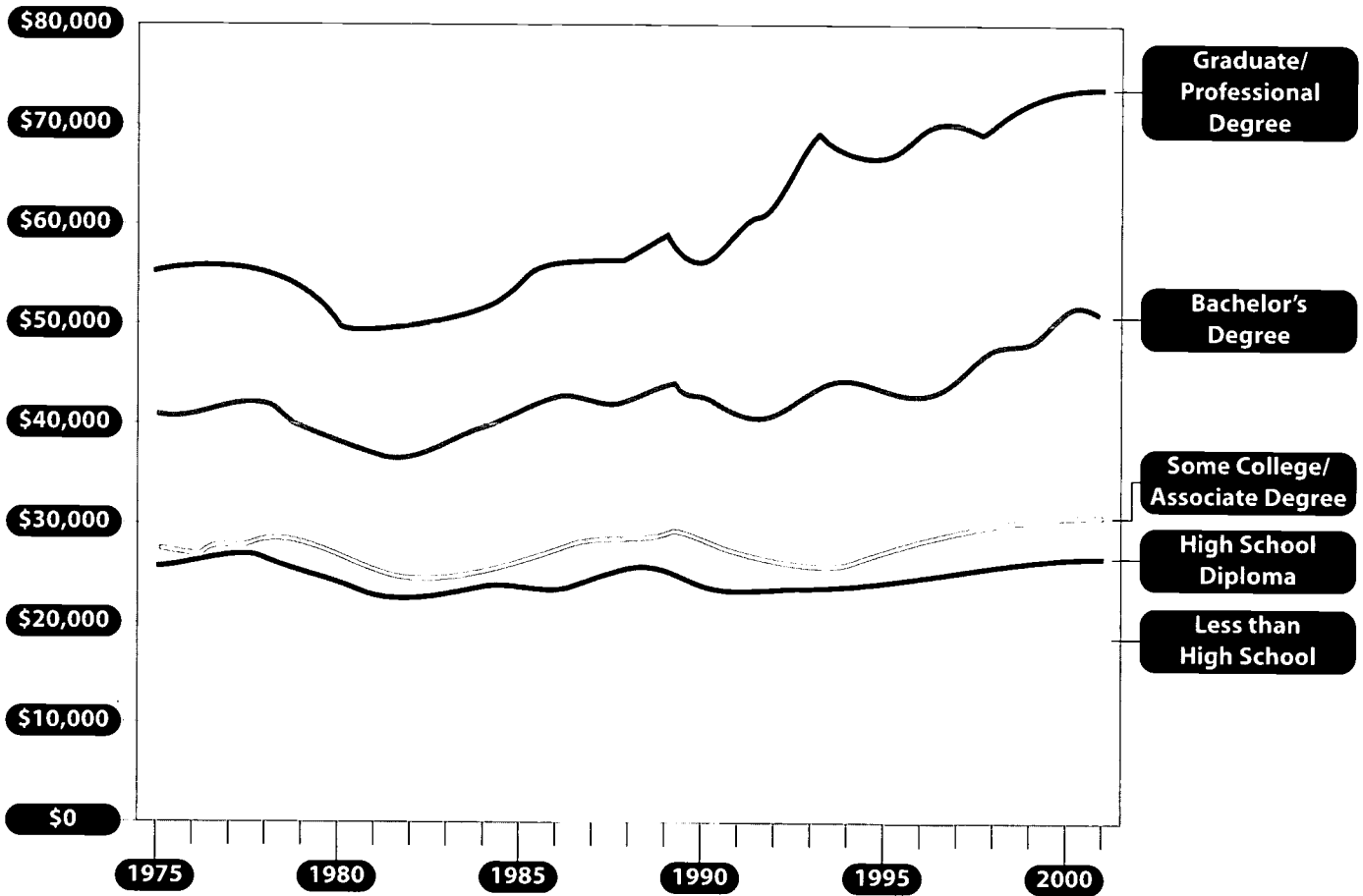
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Appendix A: Trends in Per-Capita Income for Individuals of Different Education Levels

Mean Earnings by Degree Level – Adjusted to 2001 Dollars (Using the Consumer Price Index)



Appendix B: Examples of State Comparative Data on Social and Economic Indicators Correlated with Educational Attainment

The ranking of states in terms of the percentage of the adult population age 25 and older with less than a high school diploma or equivalent is highly correlated with rankings on other critical measures:

- **Per-capita income and ultimately the strength of the state's economy** as measured by gross state product, tax revenues per capita and other indices. See <http://www.higheredinfo.org> for data on these measures.
- **Health of the state's population.** See United Health Foundation for state rankings on health, <http://www.unitedhealthfoundation.org/shr2002/index.html>.
- **The well-being of children.** See Annie B Casey Foundation, *Kids Count 2002*, <http://www.aecf.org/kidscount/kc2002>.
- **The rate of violent crime.** See United Health Foundation for state ranking on violent crime, <http://www.unitedhealthfoundation.org/shr2002/components/risks/ViolentCrime.html>.
- **Civic participation in terms of the percentage of the eligible population that votes.** See comparative data used for the state grades on "benefits" in *Measuring Up 2002*, <http://www.highereducation.org> and data on voting in national elections from the U.S. Census, <http://www.census.gov>.
- **Preparation of the workforce for employment in the New Economy.** The "New Economy" is a term used to refer to an economy characterized by global networks and technology-intensive industries. The state New Economy Index, a ranking of states in terms of their competitiveness in the New Economy, published by the Progressive Policy Institute, is widely cited as the basis for comparing states. See http://www.neweconomyindex.org/index_nei.html.

Appendix C: An Example of Use of Data To Identify Intrastate Regional Disparities: Kentucky

A basic goal of the Kentucky Postsecondary Education Reform Act of 1997 (HB1) and the subsequent Kentucky Adult Education Act of 2000 (SB1) was to raise the educational attainment of the state's population toward the ultimate goal of raising the state's per-capita income to a level at or above the national average. Narrowing disparities across the commonwealth was also an important goal. HB1 established the Kentucky Community and Technical College System as one means to address these problems. The following are examples of these disparities.

- There is a direct negative relationship in Kentucky between high per-capita personal income and the percentage of the population with less than a high school diploma.
 - The statewide average per-capita income in 2000 was \$18,093; however, 96 of the state's 120 counties were below that average. County rates ranged from a low of \$9,716 to a high of \$25,374.
 - In 2000, 25.9% of Kentucky's adult population had less than a high school diploma, but 84 of the state's 120 counties were below that average. County rates ranged from a low of 13.5% to a high of 51%.
- The patterns of college-going rates by county vary significantly, both for recent high school graduates and for adult part-time students.
 - The statewide college-going rate for recent high school graduates as a percent of 18-year-olds is 33.4%, but the county rates range from a low of 15.7% to a high of 64%.
 - The statewide college-going rate for part-time students as a percent of the adult population age 25-44 with a high school education or some college education is 5.9%, but the county rates range from a low of 1.5% to a high of 10.1%.

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Services/ Functions	Description	Example(s) of Measures/Indicators
Adult education and remedial and developmental education	Some community colleges are extensively involved as early as the middle school years in collaboration with public schools to provide supplementary instruction and support for at-risk students. These services are distinguished from the role of providing advanced-level or college-level instruction to secondary students (e.g., upper-level mathematics or science courses), classified in this matrix under “general education.” As schools seek to meet the mandates of the federal No Child Left Behind Act, they may increasingly look to community colleges as sources of assistance in meeting the needs of at-risk students for supplementary remedial services, including English as a Second Language and supplementary assistance in mathematics, reading and writing. Successful strategies to improve the preparation of low-income and educationally disadvantaged students for postsecondary education often require intervention early in the students’ secondary education.	Examples of data regarding the need for these services are the percentages of 8th-grade students in schools within a region who are performing below state standards on state assessments in mathematics, reading or writing.
General education	Community college services related to general education (as opposed to those related to remedial and developmental education) explicitly involve preparation for advanced placement in or articulation with <i>college-level work</i>. Examples include: • Dual/joint enrollment and Advanced Placement opportunities, including “middle colleges.” These may include opportunities through a community college for high school students to take advanced, secondary-level courses (e.g., in upper-level math or science) as well as enrollment in college-level courses. Depending on state and local policies, these arrangements may permit students to simultaneously earn credit that can be applied to both a high school diploma and a college degree. • Alignment of standards, curricula and modes of assessment between the community college and secondary schools within the region to reinforce efforts of the K-12 system to ensure all students graduating from the system have the necessary preparation for college-level work and/or entering a 21st century workforce. • Targeted initiatives to strengthen the preparation of low-income and educationally disadvantaged students and students who are “at-risk” of not gaining the necessary competencies for college-level work. An example is the California MESA (Mathematics, Engineering, and Science Achievement) program that provides support for pre-college students at elementary, middle and senior high schools so they excel in math and science, and can ultimately attain university-level degrees in engineering, computer science and other math-based majors. • Collaboration between secondary and community college faculty in similar subject-matter areas on curriculum design and delivery, including utilization of community college faculty to supplement secondary school instructional capacity (e.g., in upper math and science).	Examples of data regarding the need for these services within a region include: • Results of state assessments (e.g., gateway exams required for high school graduation) indicating low performance in relation to state standards at secondary schools in the region • The percentage of students from secondary schools in the region entering postsecondary institutions who are determined to need significant developmental work prior to being admitted to college-level courses • Advanced Placement enrollments in the region and the percentage of students who score 3 or above on Advanced Placement exams • The percentage of high school graduates in a region that meets the admissions requirements of the state’s public universities (e.g., the courses required for admission to the California State University or University of California) • The percentage of teachers in critical areas such as math and science who are teaching out of field or do not meet the standards of “highly qualified teacher” under the federal No Child Left Behind law • Audits of the alignment of standards, assessments and curricula of the region’s secondary schools and the requirements for college-level work at postsecondary institutions serving the region • Availability of upper-level math and science courses in the region’s high schools.

Services/ Functions	Description	Example(s) of Measures/Indicators
Transfer preparation	The services to students in the K-12 system related to the transfer function are essentially the same as those summarized above related to general education: dual/joint enrollment and Advanced Placement opportunities; 2+2/tech prep programs; alignment of standards, curricula and modes of assessment between the community college and secondary schools within the region <i>as well as with transfer institutions</i>; targeted initiatives to strengthen the preparation of low-income and educationally disadvantaged students, especially in fields such as engineering, computer science and other math-based majors; and collaboration between secondary and community college faculty in similar subject-matter areas. A key added dimension to the transfer function is the engagement of the transfer institutions – primarily baccalaureate-granting institutions – in developing the policies and procedures for articulation and transfer.	Data to assess the adequacy of preparation of students for college-level work (and eventual transfer) are similar to those outlined above for general education. Another measure is the effectiveness of the education pipeline – the percentage of 9th graders within a region who complete high school and end up obtaining a baccalaureate degree within six years of entering higher education.
Career preparation	Career preparation functions commonly include: • Coordinated and articulated programs and curricula for students to move seamlessly from secondary to postsecondary programs in specific occupational areas (e.g., tech-prep, 2+2 programs) • Career orientation programs coordinated with secondary schools and employers • Alignment of standards, assessment and curriculum between secondary and postsecondary education to ensure students have adequate preparation to enter the career of their choice (e.g., preparation in math and science to enter engineering and health professions).	
Customized training, rapid response workforce development	N/A	
Community service (noncredit and other service to the community)	Secondary students may participate in community services programs such as word processing, computer skills, photography or Web design.	
Brokering and serving as a delivery site for other providers	N/A	

Services/ Functions	Description	Example(s) of Measures/Indicators
Adult education, remedial and developmental education	Because community colleges are open-access institutions, they commonly administer an assessment (e.g., ETS COMPASS or ACT ASSET) to all incoming students to determine the level of preparation for college-level work and to advise students on placement in appropriate courses or remedial/development programs/courses.	Data from the assessment of entering students from a region are an indicator of the quality of preparation in the region's secondary schools. As states implement "gateway" assessments that students must pass before graduating from high school, data regarding the performance of students in a region are an indicator of the need for these services at the community college level – at least as a temporary measure pending improvements in secondary school performance.
General education	Recent high school graduates may seek specific services related to general education outside the structure of formal academic programs, including: • Availability of services to assess and certify general education competence • Availability of individual courses or courseware through which students – often through concurrent enrollment through two or more providers – can gain necessary general education competencies and, as necessary, earn credits that can be applied toward certification or degrees • Convenience/flexibility for students who are employed full or part time.	
Transfer preparation	The transfer function for this client group requires extensive collaboration between the community college and baccalaureate-level institutions. In addition, institutions with successful transfer programs have extensive advising, counseling and other support services to facilitate the transfer process.	The availability of accessible, affordable transfer opportunities in a region has an impact on college-going rates. In addition to information on leakage in the education pipeline, other data could include college-going rates for students directly out of high school in the region.
Career preparation	Career preparation for recent high school graduates commonly takes place at multiple levels, including: • Training leading to certification for immediate employment in skilled trades • Programs emphasizing primarily hands-on, technical training complemented by basic general education leading to a certificate or an applied associate degree (AAS) • Programs leading to associate of science (AS) degrees in professional/technical fields • Capacity to assess and certify competence as required for national or industry-based certification • Student services that help students overcome insufficient preparation for college-level work and absence of real-world experience.	Data regarding the adequacy of career preparation programs for recent high school graduates include student performance on external assessments such as examinations for certification and licensure, feedback from employers and the match/mismatch between the numbers of certificates/degrees granted in the region in specific occupational areas compared to labor-market trends in the region.

Services/ Functions	Description	Example(s) of Measures/Indicators
Remedial and developmental education	These services may be provided to two different adult client sub-groups who are seeking a GED or perhaps only short-term training required to obtain or maintain employment: • Young adults who left secondary education before obtaining a high school diploma • Adults (usually aged 25 or over) with work experience Community colleges vary greatly in the extent to which they provide adult basic education services directly (or serve as the delivery site for other providers of these services). Services may include: • On-campus adult basic education (ABE) at the level of preparation for a GED, English as a Second Language (ESL) or remediation of basic skills (e.g., 8th-grade level). As mentioned above, community colleges vary greatly in their involvement in providing ABE and ESL services. • On-campus developmental education services to adult students who are assessed as needing improvement of skills prior to engaging in college-level work. These services commonly include specialized services or courses designed to improve skills in math, writing or reading. Services may be in the form of courses or specialized designed services (e.g., individualized, self-paced mediated instruction).	Data regarding the need for these services include dropout rates in a region's secondary schools and the number of GEDs awarded to youth ages 18-24 compared to the region's population age 18-24 with less than a high school diploma or equivalent. Data regarding the need for these services include county-level census data on educational attainment in the region and surveys of adult literacy (including synthetic estimates if the state did not participate in the 2002 national survey of adult literacy to provide county-level data).
General education	The services related to general education for adults are the same as those for the recent high school graduate with perhaps even greater emphasis on relevance to career advancement and on convenience and flexibility related to full- or part-time employment.	
Transfer preparation	The transfer function for adults relates to those who seek to transfer prior learning or experience toward certification or a degree as well as to adults who seek preparation for transfer to other (baccalaureate) institutions. For example, students who were certified in skilled trades or in vocational/technical fields often wish to transfer this prior learning to an academic program leading to a degree. To facilitate this transfer, articulation and transfer agreements are needed between technical institutes/centers and community colleges (e.g., articulation of licensed practical nursing programs with associate degree programs in nursing and agreements regarding acceptance of a portion of credits earned through certificate or AAS programs). In contrast to the transfer function for the recent high school graduate, the transfer function for adults requires greater attention to: • Capacity to assess and certify for transfer purposes competencies developed through prior learning/experience • Student services to support students' persistence toward the transfer goal. Research has shown that the likelihood of a student ever transferring decreases sharply with age and the extent to which students are attending part time.	Examples of data to assess the adequacy of the transfer function for adults in a region could include: • Part-time lower-division enrollment as a percentage of the region's adult population age 25+ • Evidence of articulation agreements between technical institutes/ colleges preparing students in skilled trades and granting technical degrees (AAS) and community colleges offering AS degrees in related occupations (e.g., nursing), and data on the numbers and success rates of transfer students who obtain a credential in a reasonable period of time • Transfer rates and time-to-degree data for adult students.

Services/ Functions	Description	Example(s) of Measures/Indicators
Career preparation	The career preparation services for adults differ from those of recent high school graduates primarily in their greater emphasis on: • Improving knowledge and skills needed to advance in current employment or to prepare for employment in a new field • Assessment and certification of prior learning and experience • Accommodating the schedules of students who have work obligations and family responsibilities that need to be considered • Student services that provide support to students who must juggle study with responsibilities for employment, child care and other family responsibilities.	In addition to the data on the match/mismatch with regional labor market needs, other information to assess the adequacy of regional services to adults includes: • Part-time lower-division enrollments as a percentage of the population age 25+ in the region • The percentage of degree-credits generated in occupational programs offered in the evening, on week-ends or other times convenient to working adults • Degrees granted in occupational fields compared to job openings in those fields as determined by the state employment office.
Customized training, rapid response workforce development	The emphasis of the workforce development function is on responsiveness to employer's needs. Community colleges often organize workforce development services in a self-sustaining entity separate from the institution's academic organization. Yet, as emphasized above, employers are an important client group for most other community college functions/services. Colleges often assert that they are deeply engaged in workforce development because of their commitments to career preparation and extensive community service credit and noncredit course offerings. The function of workforce development, however, commonly goes far beyond offering courses and tailoring existing institutional services to meet the needs of employers. Examples include brokering services from other providers to meet employers' needs and contracting for instructors other than college's faculty and staff to design and deliver short-term training. The words "customized," "rapid response" and "onsite" underscore the difference between workforce development and traditional modes of operation and delivery of academic institutions.	
Community service (noncredit and other service to the community)	This service is self-explanatory. The important point is that this function/service tends to be different from "workforce development" as defined from the employer perspective.	
Brokering and serving as a delivery site for other providers	Community colleges are now serving as centers responsible for ensuring that students/clients in a given geographic area have access to postsecondary education services, <i>although the community college itself may not be the provider of those services</i> (see Table 2). In other words, the college may serve as broker for other providers – including other postsecondary, employer-based or for-profit providers – if these entities are better equipped to meet student and community needs than the community college itself. In a similar manner, community colleges are increasingly serving as delivery sites for other postsecondary providers to provide courses and programs at the upper-division and graduate levels. This collaboration is an alternative to expanding an institution's own programs into the upper division and beyond, a development that could undermine the community college mission. Increasingly students – including community college students – enroll simultaneously at more than one institution or take courses from several different providers.	

Services/ Functions	Description	Example(s) of Measures/Indicators
Remedial and developmental education	Remedial and development services to this client group commonly take place in response to explicit employer requests for assessment of employee skills and competencies (using ACT WorkKeys or other assessment tools) and for specifically designed programs to upgrade the basic literacy and workplace skills of employees. The services are often provided onsite and at times convenient to both the employer and the employee.	An example of a demand for this service would be an urgent need of a manufacturing plant to upgrade the basic competencies and workplace skills of its current employees. A plant may face the need to implement a new production process but is hindered in doing so because of the low literacy (both reading and quantitative) skills of its workforce. The need is not for job-specific training as much for basic literacy development and certification of employee competence in basic skills.
General education	General education services as defined by employers emphasize a set of general and workplace competencies related to specific occupations such as assessed through ACT WorkKeys: • Applied Mathematics • Applied Technology • Business Writing • Listening • Locating Information • Observation • Readiness • Reading for Information • Teamwork • Writing Instead of formal on-campus courses, employers are likely to seek specific tailored onsite training for employees to develop these competencies. They also are more interested in certification of competence than in academic credit or degrees, except these are recognized as certifying competence.	
Transfer preparation	The transfer function is most important to employers whose employees must obtain high levels of certification or degrees to meet requirements for licensure or the employer's need for a highly skilled workforce. Transfer services to this client group must emphasize: • Flexibility to meet employer/employee schedules • Capacity to assess and certify prior learning • Links with baccalaureate-degree institutions to ensure transfer and articulation with the minimum need for "rework."	Interviews with employers in the region can ascertain the extent of the need for accessible opportunities for employees to obtain advanced degrees to meet the needs of their professions or employers.
Career preparation	Employers as a client group are obviously concerned primarily with the availability of employees with general, workplace and specific skills, as well as with the availability of sources of training to maintain the skills of existing employees. The career preparation function engages employers in essentially all phases of program development and delivery: identification of need; clarification of required competencies (e.g., using ACT WorkKeys or similar tools); curriculum design; participation in assessment of student learning/competencies; providing opportunities for internships, co-op experiences and apprenticeships; providing feedback on performance of graduates, etc.	Employer interviews are important means of gathering information on the extent to which needs for career preparation in the region are being met adequately.

Services/ Functions	Description	Example(s) of Measures/Indicators
Customized training, rapid response workforce development	The emphasis of the workforce development function is on responsiveness to the needs of employers. Community colleges often organize workforce development services in a self-sustaining entity separate from the institution's academic organization. Yet, as emphasized above, employers are an important client group for most of the other community college functions/services. Colleges often assert that they are deeply engaged in workforce development because of their commitments to career preparation and extensive community service credit and noncredit course offerings. The function of workforce development, however, commonly goes far beyond offering courses and tailoring existing institutional services to meet the needs of employers. Examples include brokering services from other providers to meet employers' needs and contracting for instructors other than the college's faculty and staff to design and deliver short-term training. The words "customized," "rapid response" and "onsite" underscore the difference between workforce development and the traditional modes of operation and delivery of academic institutions.	
Community service (noncredit and other service to the community)	This service is self-explanatory. The important point is that this function/service tends to be different from "workforce development" as defined from the employer perspective.	
Brokering and serving as a delivery site for other providers	Community colleges are now serving as centers responsible for ensuring that students/clients in a given geographic area have access to postsecondary education services, <i>although the community college itself may not be the provider of those services</i> (see Table 2). In other words, the college may serve as broker for other providers – including other postsecondary, employer-based or for-profit providers – if these entities are better equipped to meet student and community needs than the community college itself. In a similar manner, community colleges are increasingly serving as delivery sites for other postsecondary providers to provide courses and programs at the upper-division and graduate levels. This collaboration is an alternative to expanding an institution's own programs into the upper division and beyond, a development that could undermine the community college mission. Increasingly students – including community college students – enroll simultaneously at more than one institution or take courses from several different providers.	

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